

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

YORON COHEN,

Plaintiff,

v.

**JONES LANG LASALLE IP, INC.,
PETER RIGUARDI,
and STEPHEN SCHLEGEL,**

Defendants.

CIVIL ACTION NO. 17-cv-03471 (DLC)

**[PROPOSED] CIVIL CASE
MANAGEMENT PLAN
AND SCHEDULING ORDER**

This Civil Case Management Plan, submitted in accordance with Rule 26(f), Fed. R. Civ. P., is adopted as the Scheduling Order of this Court in accordance with Rule 16(f), Fed. R. Civ. P.

1. All parties consent [] or do not consent [**X**] to conducting all further proceedings before a Magistrate Judge, including motions and trial. 28 U.S.C. § 636(c).
2. This case is [*] or is not [**] to be tried to a jury.

* It is plaintiff's position that the entirety of this case should be tried to a jury.

** It is Defendants' position that any issue not required by law to be tried to a jury, including but not limited to any determination of equitable remedies, liquidated damages, or attorneys' fees or costs, is not to be tried to a jury, as those remedies and damages are to be decided by the Court.

3. Amended pleadings may not be filed and additional parties may not be joined except with leave of the Court.
4. Initial disclosure pursuant to Rules 26(a)(1), Fed. R. Civ. P., shall be completed by: **October 10, 2017**.
5. All fact discovery shall be completed no later than **May 7, 2018**.
6. The parties are to conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York, and no changes shall be made to the limitations on discovery imposed by the Federal or Local Rules. The following interim deadlines may be extended by the written consent of all parties without application to the Court, provided all fact discovery is completed by the date set forth in paragraph 5 above:
 - a. Initial requests for production of documents to be served by: **October 31, 2017**.

- b. Initial Interrogatories under Local Rule 33.3(c) to be served by: **October 31, 2017**. Subsequent interrogatories shall be served in accordance with Local Rule 33.3(c).
 - c. Requests to admit to be served by: **April 1, 2018**.
- 7. The parties intend to submit for the Court's approval a mutually agreed upon proposed protective order pursuant to F.R.C.P. 26(c).
 - 8. By October 31, 2017, the parties shall meet and confer regarding a mutually agreeable protocol for the discovery of electronically stored information.
 - 9. Expert discovery: The parties shall complete expert witness discovery by: **June 6, 2018**. Each party shall make its expert witness disclosures described in Rule 26(a)(2) of the Federal Rules of Civil Procedure concerning expert(s), if any, to be offered on issues as to which such party has the burden of proof of otherwise or otherwise in support of the party's case, no later than **60 days before June 6, 2018**. Rebuttal disclosures must be made no later than **30 days before June 6, 2018**. Such disclosures shall be made in writing, signed and served, but shall not be filed with the court.
 - 9. Summary Judgment Motions: **Due July 12, 2018**

SO ORDERED

Dated: ____ / ____ / 2017
New York, NY

Hon. Denise L. Cote
United States District Judge